



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead





Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

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TO: Supervisor Holly J. Mitchell, Chair
Supervisor Hilda L. Solis
Supervisor Sheila Kuehl
Supervisor Janice Hahn
Supervisor Kathryn Barger

FROM: Amy J. Bodek, AICP
Director of Regional Planning 

Dr. Barbara Ferrer, PhD., M.P.H., M.Ed.
Director of Public Health 

**ILLEGAL WASTEWATER DISPOSAL CONCERNS FROM RESIDENTIAL
RECREATIONAL VEHICLE USE (ITEM NO. 62F, AGENDA OF DECEMBER 8, 2020,
AND ITEM NO. 55B, AGENDA OF APRIL 6, 2021)**

On December 8, 2020, the Board of Supervisors (Board) directed the following actions be taken to address illegal wastewater disposal from residential recreational vehicle (RV) use:

- 1) The Department of Public Health (Public Health) to conduct a review of the complaints related to sewage/wastewater disposal to identify those involving residential RV use at properties within the Antelope Valley (AV), including those properties where unpermitted disposal of wastewater, or lack of hook up to a sanitary wastewater disposal system has occurred;
- 2) Public Health to work with other County departments to identify if any permits are required for wastewater disposal through a property's sewer line and develop educational materials and an outreach plan to help inform RV residents about wastewater disposal requirements during such time as the RV is being used for temporary housing;
- 3) Public Health to work with the Chief Executive Office-Homeless Initiative (CEO-HI), Department of Public Works (Public Works), and the Los Angeles Homeless Services Authority (LAHSA) to explore potential creative solutions to provide free mobile

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wastewater disposal services to locations in the unincorporated areas where RVs tend to cluster, with a particular emphasis on rural areas within the AV; and

4) Public Health to work with Public Works and CEO-HI and LAHSA to develop inspection and enforcement strategies under the appropriate Health & Safety codes to ensure proper disposal of wastewater by residential RV users for those RVs being used as temporary shelter under the Interim and Supportive Housing Ordinance (ISHO).

On April 6, 2021, the Board adopted a motion directing the CEO-HI, in coordination with relevant County departments and key stakeholders, to provide an update on the status of the directives outlined in the December 8, 2020 motion. Furthermore, the April 6, 2021 motion directed the CEO-HI, in coordination with Public Health, the Department of Regional Planning (DRP) and Public Works, to report back on the following actions:

- 1) Develop and implement a registration program in the AV, including an educational program, to track the RVs participating in the ISHO; and
- 2) Identify other general locations in the County, in addition to the AV, where this type of registration system could be implemented, with the goal of implementing the registration program within six months throughout the County.

The April motion also directed Public Health to report back every six months on the registration program, its implementation, any necessary funding requests, and any additional outstanding issues.

On July 20, 2021, CEO-HI provided the Board with an interim report, which included an update on Public Health's progress in responding to the four directives identified in the December 8, 2020, Board motion. Responses to Directives #1 and #2 of the December motion were included in the interim report. It also identified key next steps that CEO-HI would explore to address the directives outlined in the April 6, 2021, Board motion.

On September 10, 2021, CEO-HI submitted a final report on the directives outlined in the April 6, 2021, motion, and clarified that subsequent reports will be submitted by Public Health and DRP.

On November 30, 2021, DRP and Public Health provided an update on the protocol for tracking occupied RVs permitted by the ISHO, outreach efforts, and funding requests.

The following is provided as a final report on the remaining two directives (#3 and #4) of the December 2020 motion, as well as a final report on the registration program, implementation, and outreach efforts.

December 8, 2020 Motion

Directive #3: Public Health to work with CEO-HI, Public Works and LAHSA to explore potential creative solutions to provide free mobile wastewater disposal services to locations in the unincorporated areas where RVs tend to cluster, with a particular emphasis on rural areas within the AV.

Recently, Public Health reached out to over 30 county jurisdictions across the State for input on innovative, sustainable solutions for the proper disposal of RV wastewater. Unfortunately, none of the responding counties have developed or approved any new innovative/sustainable solutions to this issue. Generally, RV users are instructed to utilize approved wastewater dump sites for their wastewater disposal.

Currently in Los Angeles County, the only options for the proper disposal of wastewater from an RV are utilizing one of the following: an existing public sewer system (requires permitting from the local building and safety department), an existing onsite septic system (existing system must be evaluated by a qualified contractor and must be preapproved by Public Health), a permitted sewage pumping service to drain the wastewater from the RV, or an RV sanitation dump station.

In 2019, a multi-agency County workgroup provided a recommendation to pilot a mobile liquid-waste pick up program to test cost-efficiency. However, no funding was identified at that time to implement it.

Directive #4: Public Health to work with Public Works, CEO-HI and LAHSA to develop inspection and enforcement strategies under the appropriate Health & Safety codes to ensure proper disposal of wastewater by residential RV users for those RVs being used as temporary shelter under the ISHO.

As indicated in the July 2021 report back to the Board, existing County Code addresses improper wastewater disposal. If complaints are received that RV wastewater is being discharged onto the ground, Public Health investigates and issues notices to comply and may also issue an Administrative Citation to both the property owner and RV user, when warranted. Additionally, DRP can take enforcement action if property owners do not comply with the requirements of the ISHO. However, to date, Public Health has not received any complaints concerning properties whose owners have inquired about hosting an occupied RV under the ISHO.

Although efforts by the Nuisance Abatement Team (NAT) to address complaints of illegal wastewater dumping from RVs was paused in 2020 due to COVID-19, NAT continues to be an effective enforcement strategy to identify egregious code violations and cite properties where violations have occurred. Since January 1, 2021, Public Health has received 15 illegal RV wastewater dumping complaints in the AV, all investigated by NAT with five cases abated and closed.

April 6, 2021 Motion

Registration and tracking

During the six-month voluntary pilot registration program, DRP documented three inquiries from property owners in the AV. None have applied for septic system connections to RVs.

Outreach

DRP is developing a mailing to inform single-family property owners in the AV about the ISHO and wastewater disposal requirements for occupied RVs. The mailing is expected to be completed in the summer of 2022.

Funding requests

Due to limited participation in the voluntary registration program, there are no funding requests for program support.

If you have any questions regarding this report, please contact Ayala Scott, Senior Regional Planner, Housing Policy Section, at ascott@planning.lacounty.gov; or Gary Hirschtick, Environmental Protection Branch Director, at ghirschtick@ph.lacounty.gov.

AJB:BF:CC:TF:AS;el

C: Chief Executive Office
Board of Supervisors
County Counsel